

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

CRIMINAL #04-10288-RWZ

UNITED STATES

v.

JOSEPH ALLEN

**DEFENDANT'S MOTION TO MODIFY CONDITIONS OF RELEASE TO ENABLE
DEFENDANT TO ACCEPT EMPLOYMENT**

Joseph Allen, the defendant in the above-captioned criminal case, hereby moves this Court to modify his conditions of release by permitting him to accept full-time employment which has been offered to him by Auto-Dyne of Beverly. If Mr. Allen is permitted to accept employment, his job responsibilities will include maintenance of the company's building at 8-10 Railroad Avenue in Beverly. A copy of a letter from the president of Auto-Dyne Corporation confirming this offer of employment is appended hereto as Exhibit 1.

As grounds therefore, defendant avers as follows:

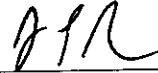
1. The defendant has complied with all conditions of release since he was released by the Court on house arrest approximately five months ago.
2. While confined to his home, Mr. Allen is not able to support himself financially, or to contribute to the support of his infant child. It is in Mr. Allen's interest and

in the public's interest that Mr. Allen contribute to his own support and to the support of his child.

Respectfully submitted,

JOSEPH ALLEN

By his attorney,



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CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon the government by mailing a copy thereof, to AUSA David Tobin, Moakley Federal Courthouse, One Courthouse Way, Suite #9200, Boston, MA 02210 and to USPSO Christopher Wylie on January 7, 2005.



James L. Sultan